IN THE DISTRICT COURT OF THE UNITED STATES FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

WILLIE MCNAIR,)
Plaintiff/Counter-Defendant,)
v.) Case No. 2:06-cv-695-WKW
RICHARD ALLEN, et al.,)
Defendants/Counter-Plaintiffs.)
JAMES CALLAHAN,)
Plaintiff/Counter-Defendant,)
v.) Case No. 2:06-cv-919-WKW
RICHARD ALLEN, et al.,)
Defendants/Counter-Plaintiffs.)

PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR PARTIAL CLOSURE OF COURT PROCEEDINGS **DURING TESTIMONY OF CERTAIN WITNESSES**

Plaintiffs Willie McNair and James Callahan do not contest the relief requested by Defendants in their Motion For Partial Closure of Court Proceedings During Testimony of Certain Witnesses filed on September 13, 2007.

Date: September 21, 2007

/s/ Vincent R. FitzPatrick, Jr. VINCENT R. FITZPATRICK, JR. HEATHER K. MCDEVITT STEPHANIE COHEN Bar Numbers (SDNY): VF2907; HM9973; SM7006 Counsel for Plaintiff Willie McNair

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- and -

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CERTIFICATE OF SERVICE

I certify that on September 21, 2007, a copy of the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: J. Clayton Crenshaw, James W. Davis, Corey Maze and Jasper Roberts.

> /s/ Thomas M. Biesty THOMAS M. BIESTY Bar No. (SDNY): TB4201

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- 3 -NEWYORK 6284097 (2K)